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Application Number 09/915,188

Filing Date July 25, 2001

First Named Inventor John c. Dute' et al.

Art Unit 2154

Examiner Name Jungwon Chang

Attorney Docket Number 1-16437

## ENCLOSURES (Check all that apply)

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|--------------|-------------------------|----------|--------|
| Firm Name    | MARSHALL & MELHORN, LLC |          |        |
| Signature    |                         |          |        |
| Printed name | Stephen G. Kimmet       |          |        |
| Date         | October 31, 2007        | Reg. No. | 52,488 |

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

|   |                            |
|---|----------------------------|
| In re Application of: John C. Dute' et al.        | ) Group Art Unit: 2154     |
|   | )                          |
| Serial No.: 09/915,188                            | ) Examiner: Jungwon Chang  |
|   | )                          |
| Filing Date: July 25, 2001                        | ) Attorney Docket: 1-16437 |
|   | )                          |
| For: System, Device and Method for Comprehensive  | )                          |
| Input/Output Interface Between Process or Machine | )                          |
| Transducers and Controlling Device or System      | )                          |

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October 31, 2007

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**SUPPLEMENTAL REPLY BRIEF**

Honorable Sir:

This is in response to the Examiner's Answer of October 22, 2007 to the Reply Brief  
filed July 24, 2007.

## Reply

In the Examiner's Answer of October 22, 2007, the Examiner asserts that the specific claim limitations of "simultaneously receiving a condition from a sensor **and** sending commands to an actuator" fails to be properly supported by the disclosure passage of "receiving inputs from the sensor **or** sending commands to an actuator" at page 4, lines 4-12. Appellants, however, assert that the Examiner did not accurately quote said limitations of the single independent claim 86 and has improperly applied the above-stated portion of the subject disclosure.

First, the above-mentioned claim limitations state that said external controller is capable of simultaneously receiving a condition from each sensor **and** capable of simultaneously sending commands to each actuator. These limitations are reflected in the preamble where it claims a comprehensive interface circuit for simultaneously sensing input devices **and** output devices. In other words, the external controller of the comprehensive interface circuit simultaneously receives conditions from each sensor and sends commands to each actuator that is connected to either of the first/second physical circuit packages.

Appellants' position on the external controller and its specific simultaneous properties is clearly stated (as mentioned previously in the Brief on Appeal) in the disclosure as, "The controller 14, which is external to the physical packages 15, is capable of simultaneously receiving a condition from each sensor and is capable of sending commands to each actuator as in the above-discussed PLC/computer configuration" (page 3, lines 14-15) (emphasis added).

On the other hand, the proper application of the citation "receiving inputs from the sensor **or** sending commands to an actuator" (page 4, lines 4-12) pertains to the claim limitations of claim 86 for the individual first/second physical circuit packages, either of

which can be "electrically connected directly, exclusively, and physically to a single sensor or a single actuator, but not both simultaneously" (emphasis added). Appellants have consistently asserted that this portion of the disclosure applies to these limitations.

Consequently, Appellants assert that since both McLeish and Sitte do not simultaneously process input/output data, then claims 86-90, which do simultaneously process input/output data, are allowable. A favorable decision to that end is courteously solicited.

Respectfully submitted,



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